

November 3, 2003

RE: RM-10806

Dear Commissioners,

This petition presents false concepts. Amateurs are not building their equipment. Most radio equipment is store bought and very difficult to repair. The real modes of operation are SSB, FM and then CW. The only bands that CW is the second most used mode are 160M-10M. Most of the "experimentation" on QRP rigs have been done for 50 years and the results are well documented.

The majority of Amateurs use phone not CW. Listening to any HF band (except 30 Meters) will prove the popularity of phone. Elimination of Element I, is not the elimination of the CW mode.

If CW is so efficient and "gets through", then why do we need exclusive CW bands. CW operators could easily operate between and "through" any SSB station.

The concept that CW will save the day in an emergency is limited to the movies and books. Anyone studying for an Amateur license today, with the idea that they will be better prepared for an emergency, is nonsense. None, of the petitions concerning retaining of Element I, have presented any current examples of how CW saved the day.

The vast majority of Amateurs are not skilled in emergency communication. Just listen to HF nets that handle health and emergency traffic during "emergencies". If the "skilled" operators had to switch to CW, one would find a drastic reduction in the number of operators who would participate.

The only national exercise claiming to be a test of emergency preparedness is the Field Day Contest in June. That is not even how an emergency works. First, you cannot set a start date for an emergency. Second, operators in emergencies don't swap call signs, station class, and signal reports. Third, the emergencies have no winners in different divisions. The contest operators are not being tested in true emergency procedures.

Your staff knows why the Commission always assigns phone frequencies for emergency communications on the HF band. It is, obviously, for more operators to participate. When was the last time that the Commission assigned a frequency in the exclusive CW band for emergency communications?

The petitioner's request to retain Morse code testing as a permanent rule should be dismissed. Times change and permanent rules can never be permanent.

Why did the Commission's staff ever assigned a Rule Making number to this COMMENT?

Please deny this “petition”.

Regards,
Melvin Lehmann